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February 13, 2019

Roxanne Rothschild  
Executive Secretary  
National Labor Relations Board  
1015 Half Street SE  
Washington, DC 20570

Re: Arbah Hotel Corporation d/b/a Meadow Lands View Hotel  
Cases 22-CA-197658; 22-CA-203130; 22-CA-205317;  
22-CA-205422; 22-CA-209158; and 22-CA-212705

Dear Ms. Rothschild,

Please accept this letter as Charging Party's opposition to Respondent's second request for an extension of time to file exceptions to the decision of the Administrative Law Judge in the above-captioned case. Exceptions to the case were originally due on January 17, 2019. The same week exceptions were due, Respondent requested a sixty (60) day extension. Respondent was granted a thirty (30) day extension, until February 15, 2019. Now, only two (2) days before the extended deadline, Respondent is again requesting yet another sixty (60) day extension.

The Charging Party strongly opposes granting Respondent a second extension. The Administrative Law Judge found that Respondent had committed serious violations of the Act, including unlawfully discontinuing health care for the entire bargaining unit, discharging an employee in retaliation for her Union activity, and barring Union representatives from the property. As a result, Bargaining Unit employees have been without health care for an extended period, forcing employees and their families to forgo medical care altogether. Furthermore, the discriminatee who was fired months ago has yet to be offered reinstatement to her job. It is respectfully submitted that extending the period employees are without health insurance and/or without a job (altogether) because counsel has not yet reviewed the file and to accommodate his vacation schedule would be unduly prejudicial.

In addition, pursuant to Section 102.2(c), because the request for extension was filed within three days of the due date, it must be "grounded upon circumstances not reasonably foreseeable in advance." It is submitted that, unlike an act of God, the time it would take new counsel's to review the case and his scheduled vacation are reasonably foreseeable.

For the foregoing reasons, it is respectfully requested the Respondent's request for a second extension be denied. Thank you for your consideration.

Sincerely,

A handwritten signature in black ink, appearing to be 'RM', with a long horizontal line extending to the right.

Richard Maroko  
General Counsel

Cc: Chevella Brown-Maynor, Esq.  
David T. Shivas, Esq.